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REFERENCE: RM 9260 "CLASS A" TV SERVICE

Office of the Secretary (1800)  
Room 222  
Federal Communications Commission  
1919 M Street NW  
Washington, D. C. 20554

This is to support the Petition for Rule making for "Class A" TV Service for the following reasons:

1. Efficient Use of The Broadcast Frequencies

Guarantee of the frequency acknowledges the specific local services of low-power broadcasting.

"A" Classification in Television reflects the local "A" Classification in AM and FM regulations. If this is valid in Radio, why not in Television?

Lower Power allows stations to fit where a higher power station is not on the Table of Assignments and will not be able to meet technical standards, allowing a more efficient use of the spectrum.

Low Power stations may work in areas where the terrain is not beneficial to high power stations. In Ogden, Channel 30, KOOG-TV has been on the air for years from a location that is on the dead side of receiving antennas. Last month the station moved to Farnsworth Peak about 40 miles away. However, as it now is with the major network stations, I can get channel 30 at home with the best picture ever. Even with a portable, channel 30's old picture had problems because of location and the mountain reflective terrain. Low power transmission sites are available that do not cause the radiation problems of a high power station in Ogden. High power similar locations are not available locally. Class A stations need to be able to be above HAAT of 2,300 meters, but with reduced power toward the horizon.

Digital Television is enhanced by "Class A" as more stations can be on the air faster, at lower cost than full power. The Commission should not overlook the large number of DV format cameras on the prosumer market today. Our JVC 9000 records in DV 480i and DV480p. We now tape

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local presentations at a low cost and broadcast the event from DV original to NTSC. With Class A people will see yourself, the city council, the local ball team, the county fair, local churches...all in Digital right now. Our Low Power Transmitter is solid state, and a Digital modulator board is all we need to be Digital Now. People can shoot their own DV Television. With the advent of local DV manufacturers can come up with a lower cost modulator. Many solid state transmitters only need a DV modulator to be in business. DV is our new home video. Lower cost, popular format, lower light levels, built in editing in some cases.

2. Encourages more public use of the broadcast band.

I started in television as the first student assistant at the University Of Nebraska under the direction of Jack McBride in 1954-56 (KUON-TV) . I participated in the study to prove that television was a teaching tool. I left television in 1960, and broadcasting in 1972. Returning in 1994 to television I find with Spanish Language programming a public reaction that is almost the same as the early days when we would rush to watch the test pattern.

Low Power Television rules allow for longer presentations of material. Operating Channel 48 in Salt Lake City for Telemundo has allowed us to provide Spanish Language programming to over 180,000 Hispanics.

- over 3 hours of local programming every week in Spanish.  
Entertainment, News, Weather, Religious and Public Service.
- Local public service is good for the community, and for business.
- Numerous one hour or longer specials broadcast as the need arises. This offers a positive alternative to the "sound bite" newscast. Some of these "specials" include:  
The Governor's Press Conference each Month  
Church of Jesus Christ of Later Day Saints  
conferences each year, 16 hours in the Spring and 16 hours in the Fall, all in Spanish.  
Catholic Church Mass in Spanish including Bishop Neiderauer's  
Guadalupe Mass from the Cathedral in Spanish.  
Monthly Catholic Masses in Spanish to help an overcrowding situation.  
Pentecostal Church Services each week.  
Cinco De Mayo Celebration  
La Raza Outstanding Awards Banquet  
La Raza Youth Conference  
Utah State Hispanic American Festival  
September 16 Independence Day Celebrations  
Ogden Hispanic Youth Conference  
Living Traditions Ethnic Festival  
Columbus Day Celebration  
Utah State Fair

Not only do we build the Hispanic Ethnic Tradition, we act as a bridge to bring the Hispanic Culture into the blend that we call "American Lifestyle". Most of our audience understands and speak some English. We help them learn more of English and more about our laws, and our culture.

### 3. Unexpected benefits of "Class A"

Discrimination. As the first Spanish Language Television Station in Salt Lake City (Telemundo Channel 48), I had to pay the bills, so we made our advertising calls. Many people said that they did not discriminate, but they also were not so sure they wanted "those people" in their businesses. Four years later we have a long way to go, but last year we started to find that advertisers were spending real money on Spanish language television, not as a donation, but because they wanted Hispanics in their business. They found that most Hispanics are good business, hard workers, who pay cash. Now the word is getting out. Not because we were looking for donations, but because we have a valid advertising buy. This tremendous step forward in acceptance repeats the discovery America made for the acceptance of Irish, Italian, Blacks, and other minorities. We are a blend of minorities that makes a majority. Everyone except for Native Americans came from somewhere else.

### 4. "Class A" can restore initial Commission Intent of service areas.

The table of allotments includes Television channels for Ogden, a community of about 250,000. However, because of economic reasons at various stages of development, all of the high power Ogden frequencies are in Salt Lake City. Channel 9 moved to Salt Lake City as the Second Public Financed Educational Channel operated by the University of Utah. It also gave us three educational stations....7,9, and 11. Channel 30 has been bankrupt trying to stay on the air in Ogden. Now it has moved to Salt Lake City. In FM three Ogden class C stations have moved to Salt Lake City.

As outlying allocations of the broadcast band move to more lucrative areas, they leave behind large communities that are under served. Class A lower costs encourage a more viable service that can be economically stable. In Rural areas class A means more local programming on a guaranteed frequency. People in Ogden and rural areas mostly hear Salt Lake City News. We know who the mayor of Salt Lake City is more than who is the Mayor of Ogden. Television news and public service today usually depends on the availability of a camera. No picture no news. And if the camera is 30 to 50 miles away....no service.

5. What is Television and does room remain for "Ma & Pa"?

Recently I spent 3 and a half years getting a Riverdale City Permit for an 85 foot LPTV Tower. In the Planning Commission Hearings and the City Council hearings, the interest in having a broadcast television station in their town was not impressive to them. They have been in a broadcast signal shadow for so long that "everyone was on cable." Riverdale rarely sees a radio station and never a television station at the City Council Meetings. The newspaper does not cover their Council as often as the city would like.

A local broadcast station did not register. Was it on cable? What will it do for us?

Once upon a time broadcasters and broadcasting had a standing in their local communities. Having a TV station was a big deal. Not so much any more. Has TV's image slipped to being below a Used Car Salesman? (I know some very nice Used Car Salesmen)


Television needs local ambassadors. People in the community, who the public know. Broadcasters who really serve their listeners. This is how broadcasting was built. Affiliates who are local. Class A fills the bill, especially if the regulation is designed to encourage broadcasting longer length local events occasionally. Production values may not be network, but look, ma...we're on TV!

To this end, I suggest that the number of "Class A" Licenses in any community be limited to licensees who are not full power television licensees in the community, or hold only one license in any radio class or only one newspaper without broadcast license. Preference should be to someone who is not a broadcast licensee in that community at all. I encourage technical standards of LPTV.

Class A is local small business. It is minority television. It is translators come alive, It is the most efficient use of spectrum. "Class A" makes room for more opinion, more points of view, and is a more economical way for "Mom and Pop" to get back into broadcasting. "Class A" returns broadcasting to it's beginnings with a strong service to community commitment.

Please approve "Class A".  
Thank you for your consideration.

Sincerely,

  
John C. Terrill  
President, K39DH

John Terrill is President of a Corporation holding a cp for K39DH Ogden and General Manager of K48EJ Salt Lake City

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